

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOHN W. AMENDT, III, and KIMBERLY R. AMENDT, husband and wife, : **CIVIL ACTION NO.**
:

Plaintiffs

V.

QUALITY JOBS, LLC d/b/a and/or a/k/a QJOB :
HOME CONSTRUCTION, LLC, BRUNO :
FERRARA, and JOHN DOE (1-2), :

Defendants

NOTICE OF REMOVAL

Defendant, Bruno Ferrara, hereby files the within Notice of Removal to the United States District Court for the Eastern District of Pennsylvania, stating as follows:

Alleged Facts:

1. Plaintiffs', John W. Amendt, III and Kimberly R. Amendt, h/w, claims arise from an allegation of a motor vehicle accident that occurred on August 6, 2019, at 16th Street and Vine Street, Philadelphia, PA. A true and correct copy of Plaintiffs' Complaint is attached hereto as Exhibit "A."
2. Plaintiffs instituted this action in the Court of Common Pleas of Philadelphia County by filing a Civil Action Complaint on May 21, 2021 at docket number 210501975. A true and correct copy of the docket is attached hereto as Exhibit "B."
3. Plaintiffs, John W. Amendt, III and Kimberly R. Amendt h/w in their Complaint, are demanding judgment against Defendants on grounds of negligence for an amount in excess of

the arbitration limits in effect in Philadelphia County, Pennsylvania, in accordance with Pennsylvania Rules of Civil Procedure.¹ See Complaint, Exhibit. “A.”

4. Plaintiffs served defendant, Quality Jobs, LLC, with the Complaint on May 26, 2021. A true and correct copy of the Affidavit of Service is attached hereto as Exhibit “C”.

5. Plaintiffs served defendant, Bruno Ferrara, with the Complaint on August 7, 2021. A true and correct copy of the August 11, 2021 email from counsel for plaintiff stating that service by United States Post Service was made on Bruno Ferrara on August 7, 2021 is attached hereto as Exhibit “D”

Diversity of Citizenship:

6. Plaintiffs, John W. Amendt, III and Kimberly R. Amendt h/w, based on information and belief and as alleged in their Complaint, are citizens of Pennsylvania. See Complaint, Exhibit “A,” ¶ 1.

7. Defendant Bruno Ferrara as alleged in the Complaint is a citizen of New Jersey. See Complaint, Exhibit “A,” ¶ 2.

8. Defendant Quality Jobs, LLC and/or a/k/a QJOB Home Construction, LLC is a New Jersey corporation with a principal place of business at 2151 Route 38 West, Unit 512 E, Cherry Hill, New Jersey 08002. See Complaint, Exhibit “A,” ¶ 4.

9. Accordingly, because both Plaintiffs and both Defendants are citizens of different states, complete diversity of citizenship exists between the parties in accordance with 28 U.S.C. § 1332, and 28 U.S.C. § 1441.

¹ Pa.R.C.P. 1021(b) and (c) provide that “[a]ny pleading demanding relief for unliquidated damages shall not claim any specific sum.” Where the county in which the action is brought has rules governing compulsory arbitration, as in Philadelphia County, the plaintiff “shall state whether the amount claimed does or does not exceed the jurisdictional amount requiring arbitration referral by local rule.”

Amount in Controversy:

10. Plaintiff-husband in his Complaint seeks to recover for “serious and permanent injuries, including but not limited to, traumatic full thickness rotator cuff tear with a recommendation for arthroscopic cuff repair, disc herniation at L5-S1, cervical spine injury, central disc protrusions at C3-4, C4-5 and C6-7 and disc bulge at C5-6 and bilateral knee contusions and myofascial pain”. See Complaint, Exhibit “A” ¶¶ 17 and 20.

11. Plaintiff-husband alleges that as a result of his alleged injuries he has “undergone great physical pain, mental anguish, emotional distress, and he will continue to endure the same for an indefinite time in the future, to her great detriment and loss”. See Complaint, Exhibit “A,” ¶ 21.

12. Plaintiff-husband contends that he “has suffered an injury which is permanent, irreparable and severe.” See Complaint, Exhibit “A,” ¶ 23.

13. Plaintiff-husband alleges he “was unable to attend to his daily activities causing a loss of earnings and he may be unable to attend to these activities for an indefinite time in the future.” See Complaint, Exhibit “A,” ¶ 25.

14. Plaintiff-husband asserts that he has and will “suffer a severe loss because of expenses which have been or may be reasonably incurred in obtaining ordinary and necessary services in lieu of those which husband-plaintiff would have performed, if husband-plaintiff had not been so grievously injured. See Complaint, Exhibit “A,” ¶ 26.

15. Plaintiff-wife asserts a claim of loss of consortium. See Complaint, Exhibit “A,” Count Two.

16. Plaintiff-wife asserts that as a result of the injuries sustained by husband-plaintiff that she “has been deprived of the society, companionship and consortium of her husband and she will be deprived of the same for an indefinite time in the future to her great detriment and loss”. See Complaint, Exhibit “A,” ¶ 29.

17. Plaintiff-husband’s allegations of physical injury, coupled with allegations of loss of earnings, mental anguish and permanency make this a claim where a verdict could undoubtedly exceed the \$75,000.00 jurisdictional threshold.

18. In accordance with §1332, this case involves (a) injuries, which, as alleged, could exceed \$75,000.00, exclusive of interest and costs; and (b) is between citizens of different states. 28 U.S.C. § 1332(a)(3).

19. Additionally, in accordance with applicable Federal Rules of Civil Procedure and/or Statutes, namely 28 U.S.C.A. §1446(b), this Notice of Removal was filed within thirty (30) days after Defendant, Bruno Ferrara, received service of Plaintiff’s Complaint. See Johnson v. Vertis, Inc., 2002 WL 31388817 (E.D. Pa.)(citing 28 U.S.C. § 1446(b)).

20. Furthermore, Defendant Quality Jobs, LLC and/or a/k/a QJOB Home Construction, LLC, consents to the removal. 28 U.S.C. § 1441(b)

21. Accordingly, pursuant to 28 U.S.C. §1332, this is a civil action that may be removed by Defendants and over which this Court has original jurisdiction.

WHEREFORE, defendant, Bruno Ferrara, respectfully requests that the aforementioned

civil action commenced against him be removed to this Court for all further proceedings.

Respectfully Submitted,

CIPRIANI & WERNER, P.C.

BY: *s/Lois M. Shenk*
Lois M. Shenk, Esquire
I.D. No. 42455
450 Sentry Parkway
Suite 200
Blue Bell, PA 19422
(610) 567-0700
Attorneys for Defendants, Quality Jobs,
LLC d/b/a and/or a/k/a QJOB Home
Construction, LLC and Bruno Ferrara

CERTIFICATE OF SERVICE

I, Lois M. Shenk do hereby certify that on this 13th day of August, 2021, I caused a true and correct copy of the attached Notice of Removal] to be served, by means of the Electronic Case Filing System of the United States District Court for the Eastern District of Pennsylvania, email, and/or first class mail, upon the following person(s) listed below:

Steven G. Wigrizer, Esquire
Saltz, Mongeluzzi, Barrett & Bendesky
One Liberty Place – 52nd Floor
1650 Market Street
Philadelphia, PA 19103

CIPRIANI & WERNER, P.C.

BY: *s/Lois M. Shenk*
Lois M. Shenk, Esquire
I.D. No. 42455
450 Sentry Parkway
Suite 200
Blue Bell, PA 19422
(610) 567-0700
Attorneys for Defendants, Quality Jobs,
LLC d/b/a and/or a/k/a QJOB Home
Construction, LLC and Bruno Ferrara

EXHIBIT A

Court of Common Pleas of Philadelphia County
Trial Division**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)

MAY 2021**001975**

E-Filing Number: 2105040782

PLAINTIFF'S NAME JOHN W. AMENDT III		DEFENDANT'S NAME QUALITY JOBS, LLC, ALIAS: QJOB HOME CONSTRUCTION, LLC	
PLAINTIFF'S ADDRESS 2521 S. GARNET STREET PHILADELPHIA PA 19145		DEFENDANT'S ADDRESS 2151 ROUTE 38 WEST UNITE 512E CHERRY HILL NJ 08002	
PLAINTIFF'S NAME KIMBERLY R. AMENDT		DEFENDANT'S NAME BRUNO FERRARA	
PLAINTIFF'S ADDRESS 2521 S. GARNET STREET PHILADELPHIA PA 19145		DEFENDANT'S ADDRESS 5832 LEXINGTON AVENUE PENNSAUKEN NJ 08103	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS 2	TOTAL NUMBER OF DEFENDANTS 2	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other: _____		
CASE TYPE AND CODE 2V - MOTOR VEHICLE ACCIDENT			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
		FILED PRO PROTHY MAY 21 2021 S. RICE	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>JOHN W AMENDT III, KIMBERLY R AMENDT</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY JASON S. WEISS		ADDRESS SALTZ MONGELUZZI & BENDESKY PC 1650 MARKET STREET, 52ND FLOOR PHILADELPHIA PA 19103	
PHONE NUMBER (215) 496-8282	FAX NUMBER none entered		
SUPREME COURT IDENTIFICATION NO. 310446		E-MAIL ADDRESS jweiss@smbb.com	
SIGNATURE OF FILING ATTORNEY OR PARTY JASON WEISS		DATE SUBMITTED Friday, May 21, 2021, 02:18 pm	

SALTZ, MONGELUZZI & BENDESKY, P.C.

BY: STEVEN G. WIGRIZER

MARY T GIDARO

JASON S. WEISS

swigrizer/mgidaro/jweiss@smbb.com

Identification No. 30396//65397/310446

1650 Market Street, 52nd Floor

Philadelphia, PA 19103

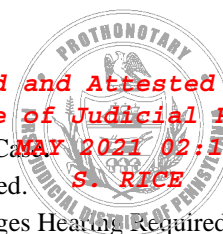
(215) 496-8282

*Filed and Attested by the
Office of Judicial Records*

This is a Major Jury Case **21 MAY 2021 02:18 pm**

Jury Trial is Demanded.

Assessment of Damages Hearing Required.



ATTORNEYS FOR PLAINTIFFS

JOHN W. AMENDT, III, and KIMBERLY R. AMENDT : COURT OF COMMON PLEAS

Husband and Wife

2521 S. Garnet Street

Philadelphia, PA 19145

Plaintiffs,

vs.

QUALITY JOBS, LLC d/b/a and/or a/k/a

QJOB HOME CONSTRUCTION, LLC

2151 Route 38 West, Unit 512 E

Cherry Hill, NJ 08002

and

BRUNO FERRARA

5832 Lexington Avenue

Pennsauken, NJ 08103

and

JOHN DOE (1-2)

Defendants.

: PHILADELPHIA COUNTY

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CIVIL ACTION

_____ TERM, 2021

No. _____

COMPLAINT - CIVIL ACTION

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE
1101 MARKET STREET
PHILADELPHIA, PA 19107
TELEPHONE: (215) 238-6333

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará mdidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATA-MENTE. SI NO TIENE ABOGADO O SINO TIENE EL DI-NERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEPHONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACIÓN DE LICENCIADOS DE FILADELFIA
SERVICIO DE REFERENCIA E INFORMACIÓN LEGAL
1101 CALLE DEL MERCADO
FILADELFIA, PA 19107
TELÉFONO: (215) 238-6333

COMPLAINT – CIVIL ACTION

FACTS COMMON TO ALL COUNTS

1. Plaintiffs, John W. Amendt, III, and Kimberly R. Amendt, husband and wife (hereinafter referred to as “husband-plaintiff and wife-plaintiff”), are adult citizens residing at the above captioned address in the Commonwealth of Pennsylvania.
2. Defendant, Bruno Ferrara, (hereinafter referred to as “Defendant Ferrara”), is an adult citizen residing at the above captioned address in the State of New Jersey.
3. Defendant, Bruno Ferrara, is the President of Quality Jobs, LLC d/b/a and/or a/k/a QJOB Home Construction, d/b/a and/or a/k/a Quality Job Home Construction.
4. Defendant, Quality Jobs, LLC d/b/a and/or a/k/a QJOB Home Construction, d/b/a and/or a/k/a Quality Job Home Construction (hereinafter referred to as “Defendant Quality Jobs”) is a corporation organized and existing under and by virtue of the laws of the State of New Jersey, with a principal place of business at the above-captioned address.



5. Defendants, John Doe (1-2), are unknown individuals/corporations who were operating and/or in control of Defendant’s vehicle and/or Defendant’s employer at the time of the accident and/or responsible for Defendant’s vehicle at the time of the accident referenced.
6. At all times material hereto, Defendant Quality Jobs, was the owner, possessor, maintainer and in control of the motor vehicle which was then and there being operated by Defendant Ferrara.

7. At all times material hereto, Defendant Quality Jobs, was acting by and through its agents, servants and/or employees, including, Defendant Ferrara, who was then and there acting in the course and scope of his employment with Defendant Quality Jobs.

8. Plaintiffs are asserting a claim against Defendant Quality Jobs for the negligent hiring, retention, supervision and training of Defendant, Ferrara, as well as, the negligent entrustment of its, vehicle, to Defendant Ferrara.

9. Plaintiffs are also asserting a claim based on *Respondeat Superior* against Defendant Quality Jobs for the conduct of it's agent, servant, ostensible agent and/or employee, Defendant Ferrara for the negligent and careless actions described herein.

10. At all times material hereto, Defendant, Quality Jobs, has engaged in business within the County of Philadelphia, Commonwealth of Pennsylvania, on a regular, systematic, continuous and substantial basis.

11. Defendant, Quality Jobs markets itself as conducting business in Philadelphia county on its website:

flourish in the preceding years. In 2006-2008, Mr. Ferrara and his crew competed several large-scale developments in Atlantic City and Philadelphia. Most notably, he developed several projects for CREI Company, located in Northern Liberty, Philadelphia. Following this, he re-shifted the

12. On August 6, 2019, at approximately 2:30 p.m., husband-plaintiff was operating his 2017 Chevrolet Silverado in a northerly direction in the right lane of 16th Street in Philadelphia, PA.

13. At the time and place aforementioned, Defendant Ferrara was operating a 2003 Ford F-150XLT owned by Defendant Quality Jobs in a westerly direction in the right lane of Vine Street, Philadelphia, PA.

14. As plaintiffs' vehicle was crossing the intersection of 16th and Vine Streets, Defendant Ferrara negligently ran the red traffic light striking plaintiffs' vehicle, causing a collision.

15. As a result of the collision, plaintiffs' vehicle was pushed into another vehicle and then flipped over.

16. The motor vehicle accident described herein was caused by the negligence of Defendants and was due in no manner whatsoever to any act or failure to act of plaintiffs.

17. As a result of the motor vehicle accident, husband-plaintiff suffered severe and permanent injuries, including but not limited to, traumatic full thickness rotator cuff tear with a recommendation for arthroscopic cuff repair, disc herniation at L5-S1, cervical spine injury, central disc protrusions at C3-4, C4-5 and C6-7 and disc bulge at C5-6 and bilateral knee contusions and myofascial pain.

COUNT ONE
Plaintiff, John W. Amendt, III v. Defendants
NEGLIGENCE

18. Plaintiffs hereby incorporate by reference all of the averments and allegations contained in the foregoing paragraphs as though the same were set forth herein.

19. The wrongful and negligent conduct of defendants consisted of, among other things, the following:

- a. Running a red traffic signal;
- b. Failing to have said motor vehicle under adequate and proper control;
- c. Failing to yield the right of way to other motor vehicles, including Plaintiff;
- d. Failing to properly observe an apparent hazard;
- e. Causing the accident described herein;
- f. Operating motor vehicle in an "over-aggressive" manner;
- g. Failing to appreciate traffic conditions;

- h. Failing to yield the plaintiff's right of way;
- i. Failing to stop said motor vehicle prior to impact with plaintiff's motor vehicle;
- j. Operating said motor vehicle in an inattentive manner;
- k. Failure to properly brake and steer said motor vehicle;
- l. Failure to operate said motor vehicle in a safe manner;
- m. Disregarding the designated lanes of travel on the road;
- n. Disregarding applicable traffic controls and/or signals;
- o. Negligence per se;
- p. Failing to prevent his motor vehicle from coming into contact with Plaintiff's motor vehicle;
- q. Operating his motor vehicle in an unsafe manner under the circumstances;
- r. Failing to use due caution in operating said motor vehicle;
- s. Failing to take due note of the point and position of the Plaintiff;
- t. Failing to yield the right-of-way to Plaintiff;
- u. Failing to maintain a proper lookout;
- v. Failing to afford Plaintiff proper and sufficient notice and warning of said motor vehicle's position and path of travel;
- w. Operating said motor vehicle without due regard to the traffic, use, width and purpose of the roadway;
- x. Failure to abide by policies and procedures regarding safe operation and maintenance of said motor vehicle;
- y. Causing the front of defendants' motor vehicle to come in contact with the motor vehicle operated by Plaintiff;
- z. Allowing an inexperienced and/or otherwise unsafe driver to operate the Quality Jobs truck;
- aa. Failing to prevent Defendant Quality Jobs truck when it knew or should have known the operator unable to drive safely and/or was likely to drive improperly;
- bb. Failing to prevent Defendant Ferrara from operating the Quality Jobs truck in an unsafe, unreasonable and/or otherwise improper manner;

- cc. Making a negligent determination that Defendant Ferrara was fit to operate the Quality Jobs truck safely;
- dd. Failing to reasonably investigate defendant Ferrara's background, training and/or ability to safely, reasonably and/or properly operate the Quality Jobs truck;
- ee. Negligent instruction and/or failing to instruct and/or train Defendant Ferrara on the safe, reasonable and proper use of the Quality Jobs truck;
- ff. Vicarious liability for the negligent acts of Defendant Ferrara;
- gg. Defendant, Quality Jobs' negligent entrustment and/or supervision of their vehicle to Defendant Ferrara;
- hh. Failure to hire competent drivers; and,
- ii. Violating the statutes and ordinances of the Commonwealth of Pennsylvania and the local municipality where the accident occurred pertaining to the operation of a motor vehicle under the circumstances.

20. As a direct and proximate result of the accident aforementioned and defendants' negligence, husband-plaintiff suffered severe and permanent personal injuries, including but not limited to, traumatic full thickness rotator cuff tear with a recommendation for arthroscopic cuff repair, disc herniation at L5-S1, cervical spine injury, central disc protrusions at C3-4, C4-5 and C6-7 and disc bulge at C5-6 and bilateral knee contusions and myofascial pain.

21. As a result of the aforesaid, husband-plaintiff has undergone great physical pain, mental anguish, emotional distress, and he will continue to endure the same for an indefinite time in the future, to her great detriment and loss.

22. As a further result of defendants' negligence and carelessness as aforesaid, husband-plaintiff was obliged to expend and/or incur large sums of money for medical attention and various purposes in an attempt to effect a cure for the aforesaid injuries, and husband-plaintiff may be compelled to expend and/or incur additional sums for such medical attention and purposes for an indefinite time in the future.

23. As a result of this accident, husband-plaintiff has suffered an injury which is permanent, irreparable and severe.

24. As a further result of Defendants' negligence, husband-plaintiff was unable to attend to his daily duties and household activities, and he may be unable to attend to these activities for an indefinite time in the future.

25. As a further result of Defendants' negligence, husband-plaintiff was unable to attend to his daily activities causing a loss of earnings, and he may be unable to attend to these activities for an indefinite time in the future.

26. As a further result of this accident, husband-plaintiff has and will suffer a severe loss because of expenses which have been or may be reasonably incurred in obtaining ordinary and necessary services in lieu of those which husband-plaintiff would have performed, if husband-plaintiff had not been so grievously injured.

27. As a result of the aforesaid negligence, husband-plaintiff incurred associated incidental expenses for which defendants are liable.

WHEREFORE, Plaintiffs demands judgment in their favor and against defendants for compensatory damages in excess of the arbitration limits in effect in Philadelphia County, Pennsylvania at the time this cause of action was commenced.

COUNT TWO
Plaintiff, Kimberly R. Amendt v. Defendants
LOSS OF CONSORTIUM

28. Wife-Plaintiff, Kimberly R. Amendt, hereby incorporates by reference all of the averments and allegations contained in the foregoing paragraphs as though same were set forth herein.

29. As a result of the injuries sustained by husband-plaintiff, John W. Amendt, III, aforesaid wife-plaintiff, Kimberly R. Amendt, has been deprived of the society, companionship and consortium of her husband, and she will be deprived of the same for an indefinite time in the future, to her great detriment and loss.

WHEREFORE, Plaintiffs demands judgment in their favor and against the defendants for compensatory and damages in excess of the arbitration limits in effect in Philadelphia County, Pennsylvania at the time this cause of action was commenced.

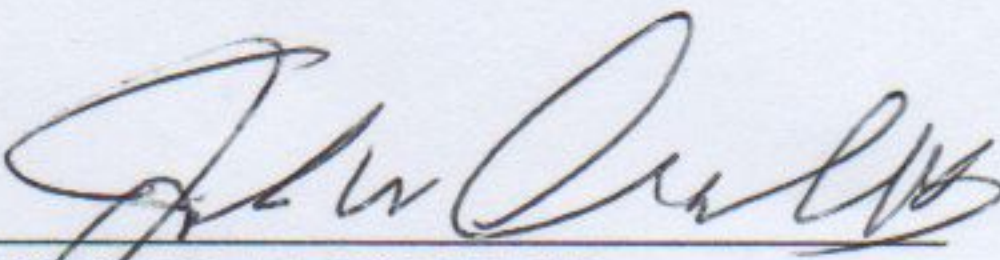
Respectfully submitted,

SALTZ, MONGELUZZI & BENDESKY, P.C.

BY: /s/ Jason S. Weiss
STEVEN G. WIGRIZER
MARY T. GIDARO
JASON S. WEISS
Attorneys for Plaintiffs

VERIFICATION

The undersigned, having read the attached which was prepared by my attorneys, hereby verifies that the information contained therein may include information furnished to my attorneys by individuals other than myself; that the language used therein is that of my attorneys, and that to the extent the information set forth therein is not known to me, I have relied upon my attorneys in taking this Verification. Subject to the above limitations, the information contained therein is true and correct to the best of my information, knowledge and belief, subject to the penalties imposed by 18 Pa. C.S. 4904.


JOHN W. AMENDT, III

VERIFICATION

The undersigned, having read the attached which was prepared by my attorneys, hereby verifies that the information contained therein may include information furnished to my attorneys by individuals other than myself; that the language used therein is that of my attorneys, and that to the extent the information set forth therein is not known to me, I have relied upon my attorneys in taking this Verification. Subject to the above limitations, the information contained therein is true and correct to the best of my information, knowledge and belief, subject to the penalties imposed by 18 Pa. C.S. 4904.

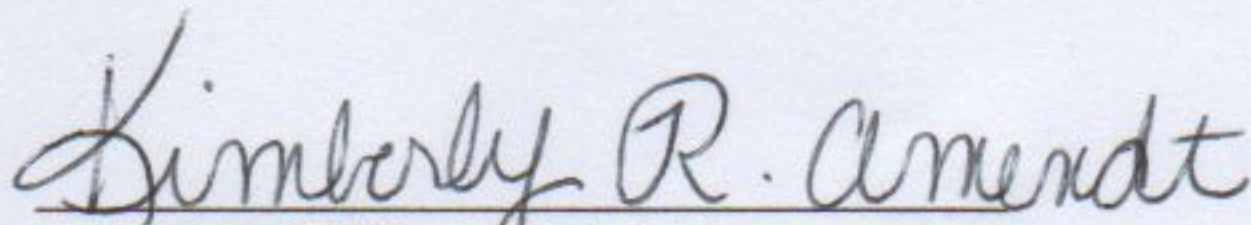

KIMBERLY R. AMENDT

EXHIBIT B



No Items in Cart LOGOUT Ishenk

Civil Docket Report

A \$5 Convenience fee will be added to the transaction at checkout.

Case Description

Case ID: 210501975
Case Caption: AMENDT ETAL VS QUALITY JOBS, LLC ETAL
Filing Date: Friday , May 21st, 2021
Court: MAJOR JURY-EXPEDITED
Location: City Hall
Jury: JURY
Case Type: MOTOR VEHICLE ACCIDENT
Status: LISTED FOR CASE MGMT CONF

Related Cases*No related cases were found.***Case Event Schedule**

Event	Date/Time	Room	Location	Judge
CASE MANAGEMENT CONFERENCE	31-AUG-2021 01:00 PM	City Hall	Case Management Center, Rm 613	<i>unassigned</i>









Case motions*No case motions were found.***Case Parties**



Seq #	Assoc	Expn Date	Type	Name
1			ATTORNEY FOR PLAINTIFF	WEISS, JASON S
Address:	SALTZ MONGELUZZI & BENDESKY PC 1650 MARKET STREET, 52ND FLOOR PHILADELPHIA PA 19103 (215)496-8282 jweiss@smbb.com		Aliases:	<i>none</i>

2	1		PLAINTIFF	AMENDT III, JOHN W
Address:	2521 S. GARNET STREET PHILADELPHIA PA 19145	Aliases:	none	
3	1		PLAINTIFF	AMENDT, KIMBERLY R
Address:	2521 S. GARNET STREET PHILADELPHIA PA 19145	Aliases:	none	
4			DEFENDANT	QUALITY JOBS LLC
Address:	2151 ROUTE 38 WEST UNITE 512E CHERRY HILL NJ 08002	Aliases:	QJOB HOME CONSTRUCTION LLC	
5			DEFENDANT	FERRARA, BRUNO
Address:	5832 LEXINGTON AVENUE PENNSAUKEN NJ 08103	Aliases:	none	
6			TEAM LEADER	ANDERS, DANIEL J
Address:	529 CITY HALL PHILADELPHIA PA 19107	Aliases:	none	

Docket Entries

Filing Date/Time	Docket Type	Filing Party	Disposition Amount	Approval/Entry Date
21-MAY-2021 02:18 PM	ACTIVE CASE			24-MAY-2021 09:38 AM
Docket Entry:	E-Filing Number: 2105040782			
21-MAY-2021 02:18 PM	COMMENCEMENT CIVIL ACTION JURY	WEISS, JASON S		24-MAY-2021 09:38 AM

Documents:	 Click link(s) to preview/purchase the documents Final Cover				 Click HERE to purchase all documents related to this one docket entry
Docket Entry:	none.				
21-MAY-2021 02:18 PM	COMPLAINT FILED NOTICE GIVEN	WEISS, JASON S		24-MAY-2021 09:38 AM	
Documents:	 Click link(s) to preview/purchase the documents Complaint - Final.pdf				 Click HERE to purchase all documents related to this one docket entry
Docket Entry:	COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 FILED.				
21-MAY-2021 02:18 PM	JURY TRIAL PERFECTED	WEISS, JASON S		24-MAY-2021 09:38 AM	
Docket Entry:	12 JURORS REQUESTED.				
21-MAY-2021 02:18 PM	WAITING TO LIST CASE MGMT CONF	WEISS, JASON S		24-MAY-2021 09:38 AM	
Docket Entry:	none.				
18-JUN-2021 09:49 AM	PRAECIPE TO REINSTATE CMPLT	WEISS, JASON S		21-JUN-2021 11:42 AM	
Documents:	 Click link(s) to preview/purchase the documents Praecipe to Reinstate Complaint.pdf Complaint [filed 5-21-21].pdf				 Click HERE to purchase all documents related to this one docket entry
Docket Entry:	COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 REINSTATED. (FILED ON BEHALF OF KIMBERLY R AMENDT AND JOHN W AMENDT)				
16-JUL-2021 11:44 AM	PRAECIPE TO REINSTATE CMPLT	WEISS, JASON S		16-JUL-2021 11:44 AM	
Documents:	 Click link(s) to preview/purchase the documents Praecipe to Reinstate Complaint 7-16-21.pdf				 Click HERE to purchase all documents related to this one docket entry

Docket Entry:	COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 REINSTATED. (FILED ON BEHALF OF KIMBERLY R AMENDT AND JOHN W AMENDT)			
22-JUL-2021 03:50 PM	LISTED FOR CASE MGMT CONF			22-JUL-2021 03:50 PM
Docket Entry:	<i>none.</i>			
23-JUL-2021 10:33 AM	AFFIDAVIT OF SERVICE FILED	WEISS, JASON S		23-JUL-2021 10:34 AM
Documents:	Click link(s) to preview/purchase the documents Affidavit of Service - Quality Jobs.pdf			
	 Click HERE to purchase all documents related to this one docket entry			
Docket Entry:	AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON QUALITY JOBS LLC BY CERTIFIED MAIL ON 05/26/2021 FILED. (FILED ON BEHALF OF KIMBERLY R AMENDT AND JOHN W AMENDT)			
24-JUL-2021 12:30 AM	NOTICE GIVEN			24-JUL-2021 12:30 AM
Docket Entry:	OF CASE MANAGEMENT CONFERENCE SCHEDULED FOR 31-AUG-2021.			
12-AUG-2021 04:28 PM	PRAECIPE TO REINSTATE CMPLT	WEISS, JASON S		12-AUG-2021 04:28 PM
Documents:	Click link(s) to preview/purchase the documents Complaint [Reinstated filed 8-12-21].pdf			
	 Click HERE to purchase all documents related to this one docket entry			
Docket Entry:	COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 REINSTATED. (FILED ON BEHALF OF KIMBERLY R AMENDT AND JOHN W AMENDT)			

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EXHIBIT C

SALTZ, MONGELUZZI & BENDESKY, P.C.

BY: STEVEN G. WIGRIZER

MARY T GIDARO

JASON S. WEISS

swigrizer/mgidaro/jweiss@smbb.com

Identification No. 30396//65397/310446

1650 Market Street, 52nd Floor

Philadelphia, PA 19103

(215) 496-8282

This is a Major ~~Filed~~ and Attested by the
Jury Trial is Demanded. ~~Office of Judicial Records~~
Assessment of Damages Hearing Required. ~~23 JUL 2021 10:33 am~~
~~G. IMPERATO~~

ATTORNEYS FOR PLAINTIFFS

JOHN W. AMENDT, III, and KIMBERLY R. AMENDT : COURT OF COMMON PLEAS

Husband and Wife

2521 S. Garnet Street

Philadelphia, PA 19145

Plaintiffs,

vs.

QUALITY JOBS, LLC d/b/a and/or a/k/a

QJOB HOME CONSTRUCTION, LLC

2151 Route 38 West, Unit 512 E

Cherry Hill, NJ 08002

and

BRUNO FERRARA

5832 Lexington Avenue

Pennsauken, NJ 08103

and

JOHN DOE (1-2)

Defendants.

: **PHILADELPHIA COUNTY**

: **CIVIL ACTION**

: **MAY TERM, 2021**

: **No. 001975**

AFFIDAVIT OF SERVICE

Jason S. Weiss, Esquire, being duly sworn according to law, deposes and says that a copy of Plaintiffs' Complaint filed in this matter on May 21, 2021 was served upon Defendant, Quality Jobs, LCC d/b/a and a/k/a QJob Home Construction, LLC at 2151 Route 38 West, Unit 512E Cherry Hill, NJ 08002, on May 26, 2021, via certified mail, return receipt requested. A copy of the signed green card is attached hereto as Exhibit "A".

SALTZ MONGELUZZI & BENDESKY P.C.

By: /s/ Jason S. Weiss

JASON S. WEISS, ESQUIRE

Attorneys for Plaintiffs

Dated: July 23, 2021

SWORN TO AND SUBSCRIBED

BEFORE ME ON THIS 23rd DAY


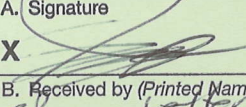
OF July, 2021

Deana Reardon

NOTARY PUBLIC

Commonwealth of Pennsylvania - Notary Seal
Deana Reardon, Notary Public
Delaware County
My commission expires June 8, 2024
Commission number 1034916
Member, Pennsylvania Association of Notaries

Case ID: 210501975

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>Quality Jobs, LLC dba and aka OJOB Home Construction, LLC 2151 Route 38 West, Unit 52E Cherry Hill NJ 08002</p>  <p>9590 9402 6125 0209 5277 40</p> <p>2. Article Number (Transfer from service label)</p> <p>7020 3160 0000 1684 5119</p>		<p>A. Signature</p> <p>X </p> <p><input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)</p> <p>EBZWA... Carter</p> <p>C. Date of Delivery</p> <p>5/26/21</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input checked="" type="checkbox"/> Certified Mail®</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p>		<p><input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

EXHIBIT "A"

EXHIBIT D

Kandy Fling

From: Adams, Debra <dadams@smbb.com>
Sent: Wednesday, August 11, 2021 10:02 AM
To: Lois Shenk; Wigrizer, Steven
Cc: Kandy Fling; Adams, Debra
Subject: RE: John Amendt

No, we have been unsuccessful in our attempts to make service. Another copy of the Complaint was mailed last week to both defendants at 2151 Route 38 West, Unit 512 E, Cherry Hill, NJ 08002. According to the USPS tracking, the item for Quality Job was delivered to an agent on 8/6/21 at 2:44 pm and the item to Ferrara was delivered to an agent on 8/7/21 at 4:12 pm. The signed green cards have not been returned as of yet.

Debra Adams, Legal Assistant to
Steven G. Wigrizer, Esquire
Jason S. Weiss, Esquire
Saltz Mongeluzzi & Bendesky P.C.
One Liberty Place, 52nd Floor
1650 Market Street
Philadelphia, PA 19103
Direct: 215-575-2977
Office: 215-496-8282 ext. 2977
Fax: 215-496-0999
dadams@smbb.com

From: Lois Shenk <LShenk@c-wlaw.com>
Sent: Wednesday, August 11, 2021 9:56 AM
To: Adams, Debra <dadams@smbb.com>; Wigrizer, Steven <swigrizer@smbb.com>
Cc: Kandy Fling <KFling@c-wlaw.com>
Subject: RE: John Amendt

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Debra, Have you made service on defendant Bruno Ferrara. I see nothing on the dockets. Please advise. Thank you, Lois

LOIS M. SHENK, ESQUIRE | Partner

CIPRIANI & WERNER PC

450 SENTRY PARKWAY, SUITE 200 | BLUE BELL, PA 19422
(MAIN) (610) 567-0700; (DIRECT) (610) 862-1868; (CELL) (215) 510-4822; (FAX) (610) 567-0712 | lshenk@c-wlaw.com

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From: Adams, Debra <dadams@smbb.com>
Sent: Friday, July 23, 2021 10:08 AM
To: Lois Shenk <LShenk@c-wlaw.com>; Wigrizer, Steven <swigrizer@smbb.com>
Cc: Kandy Fling <KFling@c-wlaw.com>; Adams, Debra <dadams@smbb.com>
Subject: RE: John Amendt

I apologize for any confusion. Thanks.

Debra Adams, Legal Assistant to
Steven G. Wigrizer, Esquire
Jason S. Weiss, Esquire
Saltz Mongeluzzi & Bendesky P.C.
One Liberty Place, 52nd Floor
1650 Market Street
Philadelphia, PA 19103
Direct: 215-575-2977
Office: 215-496-8282 ext. 2977
Fax: 215-496-0999
dadams@smbb.com

From: Lois Shenk <LShenk@c-wlaw.com>
Sent: Friday, July 23, 2021 10:06 AM
To: Adams, Debra <dadams@smbb.com>; Wigrizer, Steven <swigrizer@smbb.com>
Cc: Kandy Fling <KFling@c-wlaw.com>
Subject: FW: John Amendt

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Just not sure when I was repeatedly asking about service that you did not tell me you made service on one of the defendants.

LOIS M. SHENK, ESQUIRE | Partner

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From: Adams, Debra <dadams@smbb.com>
Sent: Friday, July 23, 2021 10:02 AM
To: Lois Shenk <LShenk@c-wlaw.com>
Cc: Wigrizer, Steven <swigrizer@smbb.com>; Adams, Debra <dadams@smbb.com>
Subject: FW: John Amendt

HI. We served Quality Jobs at 2151 Route (38) – Apt. 512E, Cherry Hill, NJ 08002. We attempted service via certified mail upon Bruno Ferrara at 5832 Lexington Avenue, Pennsauken, NJ which was on his license and the letter was returned undeliverable. We then tried to service Bruno Ferrara at 2151 Route (38) and have been unsuccessful.

Debra Adams, Legal Assistant to
Steven G. Wigrizer, Esquire
Jason S. Weiss, Esquire
Saltz Mongeluzzi & Bendesky P.C.
One Liberty Place, 52nd Floor
1650 Market Street
Philadelphia, PA 19103
Direct: 215-575-2977
Office: 215-496-8282 ext. 2977
Fax: 215-496-0999
dadams@smbb.com

From: Lois Shenk <LShenk@c-wlaw.com>
Sent: Friday, July 23, 2021 9:54 AM
To: Wigrizer, Steven <swigrizer@smbb.com>; Adams, Debra <dadams@smbb.com>
Cc: Kandy Fling <KFling@c-wlaw.com>
Subject: FW: John Amendt

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The card says service was made on 5/26/2021. Did you already have the address I gave you yesterday? You repeatedly said you had not made service. What am I missing?

LOIS M. SHENK, ESQUIRE | Partner

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From: Adams, Debra <dadams@smbb.com>
Sent: Friday, July 23, 2021 9:40 AM
To: Lois Shenk <LShenk@c-wlaw.com>
Cc: Adams, Debra <dadams@smbb.com>; Wigrizer, Steven <swigrizer@smbb.com>
Subject: RE: John Amendt

HI. See attached. I will file an Affidavit of Service. Thanks.

Debra Adams, Legal Assistant to
Steven G. Wigrizer, Esquire
Jason S. Weiss, Esquire
Saltz Mongeluzzi & Bendesky P.C.
One Liberty Place, 52nd Floor
1650 Market Street
Philadelphia, PA 19103
Direct: 215-575-2977
Office: 215-496-8282 ext. 2977
Fax: 215-496-0999
dadams@smbb.com

From: Lois Shenk <LShenk@c-wlaw.com>
Sent: Friday, July 23, 2021 9:30 AM
To: Adams, Debra <dadams@smbb.com>
Cc: Wigrizer, Steven <swigrizer@smbb.com>
Subject: RE: John Amendt

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Can you email me a copy of the green card

LOIS M. SHENK, ESQUIRE | Partner

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(MAIN) (610) 567-0700; (DIRECT) (610) 862-1868; (CELL) (215) 510-4822; (FAX) (610) 567-0712 | lshenk@c-wlaw.com

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From: Adams, Debra <dadams@smbb.com>

Sent: Friday, July 23, 2021 9:29 AM

To: Lois Shenk <LShenk@c-wlaw.com>

Cc: Adams, Debra <dadams@smbb.com>; Wigrizer, Steven <swigrizer@smbb.com>

Subject: John Amendt

Good morning: Thanks for providing the below address. We made service upon defendant, Quality Job, via certified mail at that address and received the return green card, but unfortunately we attempted service upon defendant, Ferrara, via certified mail and our process server has made several attempts without success. We also tried to serve defendant, Ferrara, via certified mail at 5832 Lexington Avenue, Pennsauken, NJ which is on his license. Let me know if you have a different address. Thanks.

From: Lois Shenk <LShenk@c-wlaw.com>

Date: July 22, 2021 at 2:18:02 PM EDT

To: "Wigrizer, Steven" <swigrizer@smbb.com>

Cc: Kandy Fling <KFling@c-wlaw.com>

Subject: RE: John Amendt

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Steve,

As you requested, this is the information on the address of the defendant:

2151 Route (38) – Apt. 512E
Cherry Hill, NJ 08002

LOIS M. SHENK, ESQUIRE | Partner

CIPRIANI & WERNER PC

450 SENTRY PARKWAY, SUITE 200 | BLUE BELL, PA 19422

(MAIN) (610) 567-0700; (DIRECT) (610) 862-1868; (CELL) (215) 510-4822; (FAX) (610) 567-0712 |
lshenk@c-wlaw.com

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From: Lois Shenk
Sent: Friday, June 11, 2021 1:59 PM
To: 'Wigrizer, Steven' <swigrizer@smbb.com>
Cc: Adams, Debra <dadams@smbb.com>; Kandy Fling <KFling@c-wlaw.com>
Subject: RE: John Amendt

Hello Steve, Have you made service? Thank you, Lois

LOIS M. SHENK, ESQUIRE | Partner

CIPRIANI & WERNER PC

450 SENTRY PARKWAY, SUITE 200 | BLUE BELL, PA 19422

(MAIN) (610) 567-0700; (DIRECT) (610) 862-1868; (CELL) (215) 510-4822; (FAX) (610) 567-0712 |
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From: Wigrizer, Steven <swigrizer@smbb.com>
Sent: Wednesday, May 12, 2021 2:13 PM
To: Lois Shenk <LShenk@c-wlaw.com>
Cc: Adams, Debra <dadams@smbb.com>; Kandy Fling <KFling@c-wlaw.com>
Subject: RE: John Amendt

I thought we did – deb pls call me

*Steven G. Wigrizer
Chair – Medical Malpractice Department
Saltz Mongeluzzi & Bendesky P.C.
One Liberty Place, 52nd Floor
1650 Market Street
Philadelphia, PA 19103
215-575-2969- direct dial
215-738-1722- cell
215-496-8282 - main
215-496-0999 - fax
swigrizer@smbb.com
www.smbb.com*

From: Lois Shenk <LShenk@c-wlaw.com>
Sent: Wednesday, May 12, 2021 1:54 PM
To: Wigrizer, Steven <swigrizer@smbb.com>
Cc: Adams, Debra <dadams@smbb.com>; Kandy Fling <KFling@c-wlaw.com>
Subject: Re: John Amendt

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Steve.
Good luck with your trial. There was another vehicle in the accident. You have not yet filed suit. if you have filed please email the writ or complaint. We found nothing on the dockets.
Lois
Sent from my iPhone

On May 12, 2021, at 1:50 PM, Wigrizer, Steven <swigrizer@smbb.com> wrote:

Lois – starting a trial, no hurry. Happy to talk resolution. No idea how there are other claimants unless there was someone in your clients

vehicle. In any event please confirm that I have named the right people and you have an extension on everything

Steven G. Wigrizer
Chair – Medical Malpractice Department
Saltz Mongeluzzi & Bendesky P.C.
One Liberty Place, 52nd Floor
1650 Market Street
Philadelphia, PA 19103
215-575-2969- direct dial
215-738-1722- cell
215-496-8282 - main
215-496-0999 - fax
swigrizer@smbb.com
www.smbb.com

From: Lois Shenk <LShenk@c-wlaw.com>
Sent: Wednesday, May 12, 2021 11:56 AM
To: Wigrizer, Steven <swigrizer@smbb.com>
Cc: Kandy Fling <KFling@c-wlaw.com>
Subject: John Amendt

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Hello Steve,

I hope you and your family are doing well during these unusual times.

I just left you a voice mail message. I was retained to represent the defendants in this matter. The case was transferred from our New Jersey office and I believe you may have spoken to Marc Jones, Esquire from our New Jersey office.

The carrier is interested in trying to resolve this matter so please at your earliest convenience forward the medical specials and the PIP information.

There are 2 other plaintiffs.

The best number to reach me is my cell phone 215-510-4822.

Thank you, Lois

LOIS M. SHENK, ESQUIRE | Partner

CIPRIANI & WERNER PC

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(610) 567-0712 | lshenk@c-wlaw.com

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